

EXHIBIT 58

From: Kevin A. Fritz
To: Nathan, Aaron E.
Cc: Stephanie Roeser; Bender, Kristin; Bryan Freedman; Joel Glover; Kristin Tahler; Nicholas Inns; daniellelazarus@quinnmanuel.com; maarenchoksi@quinnmanuel.com; Stacey Ashby; Mitch Schuster; Amit Shertzer; Summer Benson; Birtha Vaneta; Miles Cooley; Cortni Davis; Jose Perez; Jason Sunshine; mitra@ahouraijanlaw.com; Theresa Troupson; Chip Babcock; Gottlieb, Michael; Esra Hudson; Matthew Bruno; Connolly, Michaela; Taustine, Melissa; Meryl Governski; Katelyn Climaco; Daniel J. Pohlman; Maxwell Breed
Subject: Re: Lively v. Wayfarer Studios, et al., 24-cv-10049
Date: Thursday, July 24, 2025 8:31:11 PM
Attachments: [image001.png](#)
[image002.png](#)
[image001.png](#)
[image002.png](#)

***** EXTERNAL EMAIL *****

Aaron, upon your inquiry about the 860 phone number on the Case/Koslow privilege log, I looked into the matter. It is Sage Steele. We'll revise our interrogatory responses accordingly.

Sent from my iPhone

On Jul 23, 2025, at 9:57 PM, Nathan, Aaron E. <ANathan@willkie.com> wrote:

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Kevin:

Thanks for your time on the meet-and-confer earlier regarding Ms. Case and Ms. Koslow's productions and privilege logs. We understand from what you told us on the call that the Wayfarer Parties do not intend to serve privilege logs as to the documents produced by Ms. Case or Ms. Koslow, except to the extent the Wayfarer Parties will be producing the same documents from their own possession, custody, or control, in which case the Wayfarer Parties intend to assert any privilege claims as to such documents on the logs to be provided from the Wayfarer Parties regarding their own productions. Otherwise, we understand from the call that the Wayfarer Parties simply adopt Ms. Case and Ms. Koslow's logs.

Thanks,
Aaron

Aaron E. Nathan
Willkie Farr & Gallagher LLP
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From: Kevin A. Fritz <kaf@msf-law.com>
Sent: Tuesday, July 22, 2025 12:19 PM
To: Roeser, Stephanie <SROeser@manatt.com>; Bender, Kristin <KBender@willkie.com>; Bryan Freedman <bfreedman@lftcllp.com>; Joel Glover <jglover@jw.com>; Kristin Tahler <kristintahler@quinnmanuel.com>; Nicholas Inns <nicholasinns@quinnmanuel.com>; daniellelazarus@quinnmanuel.com; maarenchoksi@quinnmanuel.com; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraijanlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHUDSON@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Climaco, Katelyn <KClimaco@manatt.com>; Pohlman, Daniel J.

<dpoehlman@pryorcashman.com>; Breed, Maxwell <mbreed@pryorcashman.com>
Subject: RE: Lively v. Wayfarer Studios, et al., 24-cv-10049

*** EXTERNAL EMAIL ***

Stephanie:

We are asserting the attorney-client privilege, work product doctrine, common interest privilege, and any other applicable privilege. I am available tomorrow afternoon.



Kevin A. Fritz

Partner

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From: Roeser, Stephanie <SROeser@manatt.com>

Sent: Monday, July 21, 2025 11:35 PM

To: Bender, Kristin <KBender@willkie.com>; Kevin A. Fritz <kaf@msf-law.com>; Bryan Freedman <bfreedman@lftcllp.com>; Joel Glover <jglover@jw.com>; Kristin Tahler <kristintahler@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; danielleazarus@quinnemanuel.com; maarenchoksi@quinnemanuel.com; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraiianlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>

Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHUDSON@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Climaco, Katelyn <KClimaco@manatt.com>; Pohlman, Daniel J. <dpoehlman@pryorcashman.com>; Breed, Maxwell <mbreed@pryorcashman.com>

Subject: RE: Lively v. Wayfarer Studios, et al., 24-cv-10049

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Kevin,

Earlier, we sent you links to the re-produced documents received from Ms. Case and Ms. Koslow. Given that we have not yet heard from you about any claim of privilege by your clients as to any documents in Ms. Case or Ms. Koslow's productions, please confirm in writing by the end of the day tomorrow whether any of your clients is asserting any claim of privilege over any documents in Ms. Case or Ms. Koslow's productions, specify the nature of the privilege as to any such document, and provide us with of the basis for any such claim in the form of a privilege log.

Should you assert any claim of privilege over any documents in Ms. Case or Ms. Koslow's productions, please also provide your availability to meet and confer on Wednesday, July 23.

Thanks,

Stephanie

Stephanie Roeser

Partner



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From: Bender, Kristin <KBender@willkie.com>

Sent: Monday, July 21, 2025 12:08 PM

To: Kevin A. Fritz <kaf@msf-law.com>; Bryan Freedman <bfreedman@lftcllp.com>; Joel Glover <iglover@jw.com>; Kristin Tahler <kristintahler@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; daniellelazarus@quinnemanuel.com; maarenchoksi@quinnemanuel.com; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraianlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <iglover@jw.com>; Babcock, Chip <cbabcock@jw.com>

Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHUDSON@manatt.com>; Roeser, Stephanie <SROeser@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Climaco, Katelyn <KClimaco@manatt.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Breed, Maxwell <mbreed@pryorcashman.com>

Subject: RE: Lively v. Wayfarer Studios, et al., 24-cv-10049

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Hi all,

Unfortunately, we are taking down the 4 pm est call because we do not have the necessary information from Case/Koslow counsel in order to proceed. We'll circle back for other availability.

Best,
Kristin

Kristin Bender
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From: Bender, Kristin <KBender@willkie.com>

Sent: Friday, July 18, 2025 6:24 PM

To: Kevin A. Fritz <kaf@msf-law.com>; Bryan Freedman <bfreedman@lftcllp.com>; Joel Glover <iglover@jw.com>; Kristin Tahler <kristintahler@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; daniellelazarus@quinnemanuel.com; maarenchoksi@quinnemanuel.com; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>;

Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraiianlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHUDSON@MANATT.COM>; Roeser, Stephanie <SRoeser@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Katelyn Climaco <KClimaco@manatt.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Breed, Maxwell <mbreed@pryorcashman.com>
Subject: RE: Lively v. Wayfarer Studios, et al., 24-cv-10049

Thanks Kevin. We are available at 4 pm est on Monday. We will send a dial in.

Best,
Kristin

Kristin Bender
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From: Kevin A. Fritz <kaf@msf-law.com>
Sent: Thursday, July 17, 2025 6:28 PM
To: Bender, Kristin <KBender@willkie.com>; Bryan Freedman <bfreedman@lftcllp.com>; Joel Glover <jglover@jw.com>; Kristin Tahler <kristintahler@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; daniellelazarus@quinnemanuel.com; maarenchoksi@quinnemanuel.com; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraiianlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHUDSON@MANATT.COM>; Roeser, Stephanie <SRoeser@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Katelyn Climaco <KClimaco@manatt.com>; Pohlman, Daniel J. <dpohlman@pryorcashman.com>; Breed, Maxwell <mbreed@pryorcashman.com>
Subject: RE: Lively v. Wayfarer Studios, et al., 24-cv-10049

*** EXTERNAL EMAIL ***

Kristin:

Thanks for your email. I will look into the issue. I am available on Monday from 3pm – 5pm to meet and confer, subject to the availability of counsel for Case and Koslow.

<image001.png>

Kevin A. Fritz

Partner

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From: Bender, Kristin <KBender@willkie.com>

Sent: Thursday, July 17, 2025 5:37 PM

To: Bryan Freedman <bfreedman@lftcllp.com>; Joel Glover <iglover@jw.com>; Kristin Tahler <kristintahler@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; daniellelazarus@quinnemanuel.com; maarenchoksi@quinnemanuel.com; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Kevin A. Fritz <kaf@msf-law.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraiandlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <iglover@jw.com>; Babcock, Chip <cbabcock@jw.com>

Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHUDSON@MANATT.COM>; Roeser, Stephanie <SROESER@MANATT.COM>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Katelyn Climaco <KClimaco@manatt.com>

Subject: Lively v. Wayfarer Studios, et al., 24-cv-10049

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Kevin,

We received a document production from third parties Katie Case and Brianna Koslow, which we forwarded to you this afternoon. In our initial scanning of the production, we noticed certain messages were produced that included you and your co-counsel. Out of an abundance of caution, we promptly stopped our review and are reaching out to Ms. Case's and Ms. Koslow's counsel. We are in the process of determining a manner for return of the documents, which we are doing pursuant to the ESI stipulation, without waiving any argument that the documents are not protected by any privilege and are subject to production.

To the extent the Wayfarer Parties will be asserting any privilege, please provide the basis for that assertion and your availability for a meet and confer tomorrow. We reserve the right to seek *in camera* review of these documents.

Thank you,

Kristin

Kristin Bender

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